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Robert H. Jackson
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USWEST

March 22, 1996

Ms. Mindy Littell
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Re: CC Docket No. 95-116, *Telephone Number Portability*
Response to Commission Data Request

Dear Ms. Littell:

On March 12, 1996, we spoke on the telephone. During our conversation, you asked me, on behalf of U S WEST Communications ("USWC"), several questions regarding the incremental costs of interim number portability using Remote Call Forwarding ("RCF") or Direct Inward Dialing ("DID") services. The Commission requested answers to these questions by March 22. Attached are the responses of USWC to those questions.

In order to find these answers most useful, several points need to be understood. The costs shown are based upon representative costs from several states. USWC does not have any company-wide cost study related to interim number portability. Therefore, we selected a representative state's costs. Costs for other states may vary based on such factors as network architecture and local calling characteristics.

As requested, USWC has identified incremental costs. Those cost figures also recognize Commission requirements that costs contain some overhead loadings. As noted on the attachment, the costs use a weighted average for simultaneous call paths. The weightings and underlying assumptions are set forth in the attachment.

You will note that USWC has supplied costs for Directory Number Route Indexing ("DNRI"), rather than for DID. USWC does not have any cost studies that show interim number portability through the use of DID trunks. We have studies only for RCF and DNRI. To assist your review of the attached material, I will provide a brief description of RCF and DNRI as used by USWC to provide interim number portability.

RCF requires the assignment of two telephone numbers to the customer of the Alternative Local Exchange Carrier ("ALEC"). The first number (the customer's current or "portable" number) is used by network providers to route calls to the USWC central office switch that is identified by the NXX in the customer's portable number. The USWC switch translates the portable number (a "destination number") that is assigned by the ALEC. The NXX in this second number identifies the ALEC's switch. The USWC switch then forwards the incoming call to the ALEC's switch using the same trunks and facilities that are used to deliver local or Extended Area Service ("EAS") traffic from USWC customers to customers of the ALEC. The call is forwarded to the ALEC with the destination number assigned by the ALEC (rather than the portable number) in the called party field of the signaling message.

DNRI is similar to RCF. However, DNRI does not translate the portable number into a destination number as does RCF. Rather, DNRI uses the portable number to identify an outgoing trunk to the ALEC. Unlike RCF, DNRI does not forward the destination number to the ALEC -- but instead, forwards the portable number to the ALEC.

As a final point, we hope that this information is being requested for informational purposes, rather than as part of an effort by the Commission to take action concerning interim number portability. State regulators generally have already taken actions concerning interim number portability. In view of the limited resources of the Commission and the large number of actions it must take to implement other parts of the Telecommunications Act of 1996, interim number portability is best left to the states.

I hope this information will meet the Commission's needs. If you have any further questions please feel free to contact me.

Sincerely,

Robert H. Jackson

Robert H. Jackson
Executive Director - Federal

Regulatory

cc: Richard Welch
Carol Mattey

CC Docket No. 95-116 - Telephone Number Portability

U S WEST Communications' ("USWC") Answers to Commission Request for Information on the Costs of Interim Number Portability

I. What are the incremental costs of providing Service Provider Portability ("SPP") through Remote Call Forwarding ("RCF")?

A. Identify the cost components and state the amount of costs for each component for the following factors related to RCF.

Cost estimates identified are based on the existing Service Provider Number Portability ("SPNP") costs, to be used as a typical state to represent our costs. We do not have a region-wide, USWC average cost study available at this time for RCF.

Costs also take into account a weighted average for simultaneous call paths, rather than having a per call path cost. Assumptions used in the weighting for simultaneous call paths are as follows:

50% Residence	80% require 1 Call Path 20% require 2 Call Paths
50% Business	10% Large Business (8 paths) 70% Medium Business (4 paths) 20% Small Business (2 paths)

1. call termination costs,

None applicable

2. feature activation costs,

$1.00 per number ported per month

3. call re-origination costs,

$4.05 per number ported per month
(Local Switch Tandem function)

4. transport costs,

$1.05 - per number ported per month
(Terminations/facilities)

5. tandem switching costs,

$4.30 - per number ported per month
(Tandem switching)

6. any other operational costs.

Measurement - $.01 per number ported per month
Operator Services - $.31 - per number ported per month

B. Whether and how costs vary between intraswitch and interswitch calls.

1. Provide the percentage of intraswitch ported calls versus total ported calls.

Percentage of Intraswitch ported calls - 21%

Additional costs are incurred for transporting ported calls to an Alternative Local Exchange Carrier ("ALEC ") on an interoffice basis that are not recovered by local exchange charges. These costs are included in the costs for porting the call to an ALEC who is the cost causer in this scenario. These incremental costs are outside the purview of a Bill and Keep arrangement.

Number portability calls that originate in the end office that formerly served the ported customer were in effect intraoffice calls and are no different from a normal Bill & Keep call. With number portability, those calls become interoffice calls and their costs are recovered under a local exchange tariff. There are no additional transport costs associated with them that would not otherwise be covered by a Bill and Keep arrangement. USWC accounted for these calls by excluding intraoffice calls from the interoffice cost calculations for number portability.

2. Provide the percentage of interswitch ported calls versus total ported calls.

79%

II. What are the incremental costs of providing SPP through Direct Inward Dialing ("DID") trunks?

A. Identify the cost components and state the amount of costs for each component for the following factors related to DID.

USWC currently does not offer Interim Number Portability utilizing the DID option. We do provide a second option, however, utilizing DNRI (Directory Number Route Indexing). Cost estimates identified are based on the existing Service Provider Number Portability (SPNP) costs, to be used as a typical state to represent our costs. We do not have a region-wide, USWC average cost study available at this time for DNRI.

Costs also take into account a weighted average for simultaneous call paths, rather than having a per call path cost. Assumptions used in the weighting for simultaneous call paths are as follows:

50% Residence	80% require 1 Call Path
	20% require 2 Call Paths
50% Business	10% Large Business (8 paths)
	70% Medium Business (4 paths)
	20% Small Business (2 paths)

1. call termination costs,

None applicable

2. **feature activation costs,**

   None applicable

3. **call re-origination costs,**

   $4.05 per number ported per month
   (Local Switch Tandem function)

4. **transport costs,**

   $1.05 - per number ported per month
   (Terminations/facilities)

5. **tandem switching costs,**

   $4.30 - per number ported per month
   (Tandem switching)

6. **any other operational costs.**

   Measurement - $.01 per number ported per month
   Operator Services - $.31 - per number ported per month

B. **Whether and how costs vary between intraswitch and interswitch calls.**
   1. **Provide the percentage of intraswitch ported calls versus total ported calls.**

      Percentage of Intraswitch ported calls - 21%

      Additional costs are incurred for transporting ported calls to an ALEC on an interoffice basis that are not recovered by local exchange charges. These costs are included in the costs for porting the call to an ALEC who is the cost causer in this scenario. These incremental costs are outside the purview of a Bill and Keep arrangement.

      Number portability calls that originate in the end office that formerly served the ported customer were in effect intraoffice calls and are no different from a normal Bill & Keep call. With number portability, those calls become interoffice calls and their costs are recovered under a local exchange tariff. There are no additional transport costs associated with them that would not otherwise be covered by a Bill and Keep arrangement. USWC accounted for these calls by excluding intraoffice calls from the interoffice cost calculations for number portability.

   2. **Provide the percentage of interswitch ported calls versus total ported calls.**

      79%

III. What are the administrative costs to provide RCF and DID to competitors? (For example, billing costs, record keeping costs, charges for initiating service.)

Billing Costs

Billing - $.01 per number ported per month

Record Keeping/Initial Establishment/Complex Translations/Order Negotiation Non-Recurring

	Per Number Ported	Service Establishment
Remote Call Forwarding	$14.50	$38.00
Directory Number Route Index	$14.00	$53.00

IV. Are there any other costs associated with providing RCF or DID, which have not been otherwise identified? If so, for each cost provide the following:

A. Identification of the cost(s).
B. Amount of the costs, and
C. Explanation of the costs.

Other costs associated with providing RCF:

Non-Traffic Sensitive Costs - $1.16 per number ported per month

Call forwarding requires physical line equipment in the 1AESS and 5ESS switches and a logical port in the DMS 100 switch. In either case, additional investment is required. The cost of the physical line equipment is expressed as the Non-traffic Sensitive Central Office Equipment (NTS COE).

Other costs associated with Directory Number Route Index

None

V. Do any of these costs identified above vary by volume of ported calls (e.g., costs per 1000 ported calls). If so, provide detailed explanation of the cost causative relationships between the volume of ported calls and the variable costs factor.

Yes. The following elements are volume sensitive and vary by volume of ported calls. As the number of calls/minutes of use ("MOU") increases, the costs will increase directly. For example, if the calls/MOU increase 50% for the volume sensitive elements, the costs will increase proportionately.

MOU Volume Sensitive Elements

- feature activation costs
-call re-origination costs (local switch tandem function)
-transport costs (terminations/facilities)
-tandem switching costs (tandem switching)
-any other operational costs (measurement, operator services)